

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
Keith M. Scriven DBA Hanlan Midgette : Case No.: 22-11818
Scriven, LLC, DBA Hanlan Midgette : Chapter 11
Scriven, LP, DBA Scriven, Inc. : Judge Ashely M. Chan
: * * * * * * * * * * * * * * * * *

Debtor(s)

Ajax Mortgage Loan Trust 2021-D, :
Mortgage-Backed Securities, Series 2021- :
D, by U.S. Bank National Association, as :
Indenture Trustee :

Movant, :

vs :

Keith M. Scriven DBA Hanlan Midgette :
Scriven, LLC, DBA Hanlan Midgette :
Scriven, LP, DBA Scriven, Inc. :

**Richard Furtek, Subchapter V Trustee
Respondents.**

MOTION TO APPEAR PRO HAC VICE

Comes now, Edward H. Cahill, and requests permission to appear and participate as counsel for Ajax Mortgage Loan Trust 2021-D, Mortgage-Backed Securities, Series 2021-D, by U.S. Bank National Association, as Indenture Trustee ("Creditor"), a creditor in the above-entitled case, pursuant to Local Bankruptcy Rule 2090-1 (b). In support of this Motion, Movant states:

1. I am licensed to practice in the State of Ohio. I am an active member in good standing in this jurisdiction.
2. There are no disciplinary proceedings pending against me in any jurisdiction.
3. I am familiar with the local rules of this court and agree to comply with same.

4. I have paid the applicable *pro hac vice* fee to the U.S. District Court of the District of Pennsylvania.
5. I have not sought *pro hac vice* appearance before this Court within the last twelve (12) months.

WHEREFORE, I, Edward H. Cahill, respectfully request permission to appear and participate as counsel for Creditor in the above captioned action.

Respectfully submitted,

/s/Edward H. Cahill

Edward H. Cahill
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
Telephone: 614-220-5611
Fax: 614-627-8181
Attorneys for Creditor
The case attorney for this file is Edward H.
Cahill
Contact email is ehc@manleydeas.com

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: Case No.: 22-11818
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Scriven, LLC, DBA Hanlan Midgette : Judge Ashely M. Chan
Scriven, LP, DBA Scriven, Inc. : * * * * *

Debtor(s)

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Ajax Mortgage Loan Trust 2021-D, :
Mortgage-Backed Securities, Series :
2021-D, by U.S. Bank National :
Association, as Indenture Trustee :

Movant, :
vs :
:
Keith M. Scriven DBA Hanlan Midgette :
Scriven, LLC, DBA Hanlan Midgette
Scriven, LP, DBA Scriven, Inc.

Richard Furtek

Respondents.

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Pro Hac Vice was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Richard Furtek, Chapter 11 Trustee, Rfurtek@furtekassociates.com

Ronald G. McNeil, Attorney for Keith M. Scriven DBA Hanlan Midgette Scriven, LLC, DBA Hanlan Midgette Scriven, LP, DBA Scriven, Inc., r.mcneil1@verizon.net

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Keith M. Scriven DBA Hanlan Midgette Scriven, LLC, DBA Hanlan Midgette Scriven, LP,
DBA Scriven, Inc., 1007 North 6th Street, Philadelphia, PA 19123

/s/Edward H. Cahill

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**Keith M. Scriven DBA Hanlan Midgette
Scriven, LLC, DBA Hanlan Midgette
Scriven, LP, DBA Scriven, Inc.**

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: Case No.: 22-11818
: Chapter 11
: Judge Ashely M. Chan
: * * * * *

Debtor(s)

**Ajax Mortgage Loan Trust 2021-D,
Mortgage-Backed Securities, Series 2021-
D, by U.S. Bank National Association, as
Indenture Trustee**

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Movant,

vs

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Scriven, LLC, DBA Hanlan Midgette
Scriven, LP, DBA Scriven, Inc.**

**Richard Furtek, Subchapter V Trustee
Respondents.**

ORDER GRANTING MOTION TO APPEAR *PRO HAC VICE*

Upon the motion of Edward H. Cahill to be admitted, *pro hac vice*, to represent Creditor Ajax Mortgage Loan Trust 2021-D, Mortgage-Backed Securities, Series 2021-D, by U.S. Bank National Association, as Indenture Trustee, an interest party in the above referenced case, and upon Movant's certifications contained in her motion, it is hereby

ORDERED, that Edward H. Cahill is admitted to practice, *pro hac vice*, in the above bankruptcy case to represent Ajax Mortgage Loan Trust 2021-D, Mortgage-Backed Securities, Series 2021-D, by U.S. Bank National Association, as Indenture Trustee.

SO ORDERED, this _____

Ashely M. Chan, Judge
United States Bankruptcy Court